



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM
401 CHURCH STREET, 8TH FLOOR, L&C ANNEX
NASHVILLE, TN 37243-1551

National Emission Standards for Hazardous Air Pollutants (NESHAP)
Paints and Allied Products Manufacturing Operations at Area / Small Sources
40 CFR 63 CCCCCC (7C)

[This notification is **Not** for sources in Shelby, Davidson, Knox and Hamilton Counties-check with your local air program]

-IMPORTANT-

Regulatory Deadlines Need Your Attention!

Dear Owner or Operator,

The Small Business Environmental Assistance Program (SBEAP) is trying to contact facilities affected by EPA's NESHAP Rule for Paints and Allied Products operations at area/small sources (40 CFR 63 Subpart CCCCCC (7C)). SBEAP is a government assistance Program without enforcement authority that provides free and confidential assistance to small businesses.

Our Program contacted many of you about the June 1, 2010 deadline for submitting an Initial Notice to both the EPA and Tennessee air regulating agencies. This letter is to remind you again about the regulatory deadlines and requirements.

Which Facilities Are Affected?

- Facilities that produce materials through blending and mixing such products as paints, inks, stains, varnishes, shellacs, putties, sealers, caulks, adhesives, or other coatings from raw materials that consist of a mixture of resins, pigments, solvents, and/or other additives **and**
- Area Sources of Hazardous Air Pollutants (HAPs) [Sources that emit less than 10 tons annually of a single HAP or less than 25 tons annually of a combination of HAPs] **and**
- Commenced processing, using, or generating materials containing any of the following **Target HAPs**:
 - benzene
 - methylene chloride
 - compounds of **cadmium** (Cd), **chromium** (Cr), **lead** (Pb), or **nickel** (Ni)

What are the Regulatory Deadlines?

- **Existing Operations** [started before June 1, 2009]
 - Must be in compliance **by December 3, 2012**
 - Must submit a Notice of Compliance on or before **June 3, 2013**
- **New Operations** [started on or after June 1, 2009]
 - Must be in compliance with the new rules **upon start-up**
 - Must submit an Initial **and** Notice of Compliance Notification - **No later than 180 days after initial start-up of the operations or June 1, 2010, whichever is later**

What are the requirements for Compliance?

- * **Minimize** fugitive emission of particulates with Target HAPs according to the 7C Rule *during* the following manufacturing stages:
 - **Addition** of *pigments* and *solids* with Target HAPs
 - to **process vessels** *and*
 - to the **grinding and milling** processes
 - **Milling** or **grinding** of material with Targeted **HAPs**
- * All **particulate control devices** used in **minimizing** fugitive emission of particulates as required are inspected and monitored as scheduled.
 - **Initial particulate control device inspections and tests**
 - Performed at least by 180 days after the compliance deadline to demonstrate control compliance
 - Includes a demonstration of visible emission of the exhaust from all devices that vent to the atmosphere is less than 10% opacity using EPA Method 203C
 - **Ongoing** periodic inspections
 - Start inspections and tests on of each PM control device as required *after* Initial Inspections & Tests.
- * Vessels and Material with **benzene** and **methylene chloride**
 - Keep any process or mixing vessel that contains benzene or methylene chloride covered according to the Rule.
 - All rags or other material that contain solvents that include benzene or methylene chloride are in a closed container.
 - Leaks and spills of materials containing benzene or methylene chloride are minimized and cleaned up as soon as practical, but not longer than 1 hour from the time of detection.

Additional information about these requirements can be found at the SBEAP's Paints and Allied Product Facilities webpage: http://www.tn.gov/environment/apc/sbeap/sbeap_paintman.shtm. Please contact the Small Business Environmental Assistance Program to assist you in meeting these new requirements at **1-800-734-3619** or e-mail at BGSBEAP@tn.gov.

Sincerely,

Sharon Goodwin-Walker
Environmental Specialist

Enclosures